

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:19cr47
v.)	
)	
DAVID ALCORN,)	
)	
AGHEE WILLIAM SMITH II,)	
)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF INSPECTOR JASON W. THOMASSON

I, Jason W. Thomasson, do hereby affirm:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been a Postal Inspector for almost ten years.
2. I am one of the case agents assigned to the investigation and prosecution of defendants David Alcorn and Aghee William Smith II (the “defendants”). As such, I have been involved with contacting the government’s witnesses, serving subpoenas on them, interviewing them, and assisting in preparing them for trial.
3. The following information is either, as noted, based on my personal knowledge or my discussions with the other case agents involved in the investigation and prosecution.
4. The same reasons making S.B. and V.H. unavailable for the November 2021 trial continue to prevent S.B. and V.H. from traveling to Norfolk for the February 1, 2022, trial.
5. On January 6, 2022, Special Agent Andrew Bowers contacted witness K.S. via the telephone.

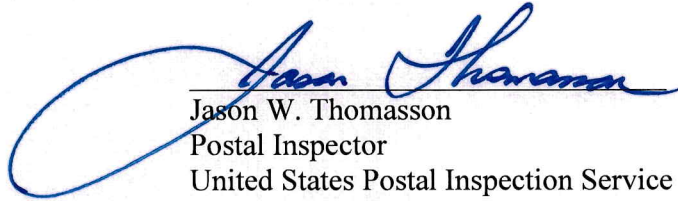
6. K.S. stated he continues to be unable to travel to Norfolk for the February 1, 2022, trial. He is 64 years old and due to his age is in a higher risk category should he contract COVID-19. He also suffers from extreme vertigo which prevents him from flying. In addition, his wife has not recovered from her accident. In addition to her ambulatory issues, she is now suffering from severe back pain and requires routine pain management. He is the sole caretaker of his wife at this time, and there is no one else available to assist. For these reasons, K.S. is unable to travel to Norfolk.

7. K.S. was deposed in Sacramento, California, on November 5, 2021.

8. Defendant Aghee William Smith II and his attorney were physically present and participated in the deposition. The other defendants participated virtually through counsel.

I declare the previous information to be true to the best of my knowledge and belief.

1-24-22
Date


Jason W. Thomasson
Postal Inspector
United States Postal Inspection Service